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**COUNSEL FOR TRANS UNION LLC**

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Las Vegas, Nevada 89149

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

YAUSMENDA FREEMAN,  
  
Plaintiff,  
  
v.  
  
TRANSUNION, LLC,  
  
Defendant.

Case No. 2:21-cv-01117-JAD-NJK

**UNOPPOSED MOTION AND ORDER**  
**EXTENDING DEFENDANT TRANS**  
**UNION LLC'S TIME TO FILE AN**  
**ANSWER OR OTHERWISE**  
**RESPOND TO PLAINTIFF'S THIRD**  
**AMENDED VERIFIED PETITION TO**  
**PERPETUATE TESTIMONY**  
**(FIRST REQUEST)**

Plaintiff Yausmenda Freeman ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by and through their respective counsel, file this Unopposed Motion Extending Defendant Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Miscellaneous Affidavit.

1. On August 20, 2021, Plaintiff filed her Third Amended Verified Petition to Perpetuate Testimony without a Summons and without serving Trans Union.

2. On August 31, 2021, counsel for Trans Union communicated with Plaintiff via telephone regarding service of the Third Amended Verified Petition to Perpetuate Testimony as well a stipulated date for Trans Union to file a responsive pleading to the Third Amended

1 Verified Petition to Perpetuate Testimony. Plaintiff agreed Trans Union's responsive pleading  
2 deadline would be extended to September 21, 2021.

3 3. Trans Union's counsel will need additional time to review the documents and  
4 respond to the allegations in Plaintiff's Third Amended Verified Petition to Perpetuate  
5 Testimony. This Unopposed Motion is made in good faith and not for the purposes of delay.

6 4. Plaintiff has agreed to stipulated to September 21, 2021 as the deadline for Trans  
7 Union has to answer or otherwise respond to Plaintiff's Miscellaneous Affidavit. This is the  
8 first motion for extension of time for Trans Union to respond to Plaintiff's Third Amended  
9 Petition.

10 Dated this 31<sup>st</sup> day of August 2021.

11 **Quilling Selander Lownds**  
12 **Winslett & Moser, P.C.**

13 /s/ Jennifer Bergh

14 Jennifer Bergh

15 [jbergh@qslwm.com](mailto:jbergh@qslwm.com)

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21 ***Counsel for Trans Union LLC***

22 IT IS SO ORDERED.

23  
24   
25 \_\_\_\_\_  
26 NANCY J. KOPPE  
27 UNITED STATES MAGISTRATE JUDGE

28 DATED: September 1, 2021